

EXHIBIT 1

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	Washington DC 20005
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ROGERS JOSEPH O'DONNELL

Lisa N. Himes
202.777.8953 (d)
lhimes@rjo.com

January 15, 2019

VIA FEDERAL EXPRESS

U.S. General Services Administration
FOIA Requester Service Center (H1F)
1800 F Street, NW, Room 7308
Washington, DC 20405-0001

Re: Freedom of Information Act Request

To Whom It May Concern:

On behalf of client, S.P. Plaza, LLC, Rogers Joseph O'Donnell, PC makes this request for the records described below pursuant to the Freedom of Information Act, 5 U.S.C. § 552.

We request that you adhere to the time limitations set forth in 5 U.S.C. § 552(a)(6)(A). We also ask that you forward information related to any individual request without waiting until all records are located (i.e., please provide records on a rolling basis). If you determine that a record contains material exempt from disclosure, please review it for possible discretionary disclosure. In addition, we request that you produce any and all segregable portions of the record in question. Please notify me when responsive records are either furnished or specifically identified and denied for release. If no records exist for any request, please provide written confirmation of same.

We further request that, pursuant to 5 U.S.C. § 552(a)(3)(B), your agency produce responsive documents in the native electronic format in which the document was created. To the extent that your agency is unable to produce the responsive documents in the requested format, we request that your agency confirm that the record does not exist in native format and produce the documents in the following format, listed in accordance with our preference: 1) PDF format; or 2) paper copy. While the burden is on the government to produce all documents within the required time period, we are willing to discuss and agree upon the means and sequence of production to facilitate government compliance with the law.

To the extent that you determine that any subject document will not be disclosed because it meets any of the criteria in the FOIA for nondisclosure, you are requested to identify such documents in accordance with the requirements of *Vaughn v. Rosen*, 523 F.2d 1136 (D.C. Cir. 1975). To the extent that you determine that any subject document will not be disclosed because it is classified in accordance with document classification procedures of your Department, request is hereby made that such document be declassified or redacted sufficiently to enable useful review and inclusion of its identifying characteristics under *Vaughn v. Rosen*.

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REQUESTED DOCUMENTS

Please provide the following records¹ to the undersigned:

1. All documents² from the period of January 1, 2016 through January 15, 2019 that refer or relate to the McAllen Phase I GSA Feasibility Study titled, "U.S. Courthouse McAllen, TX Final Report 04.20.2017."
2. All documents from the period of January 1, 2016 through January 15, 2019 that refer or relate to the McAllen, Texas in-depth Housing Study, dated June 24, 2016, which is referenced on page 5 of the U.S. Courthouse McAllen, TX Final Report 04.20.2017.
3. All documents between GSA and Congress related to the U.S. Courthouse in McAllen, Texas from the period of January 1, 2016 through January 15, 2019, including those related to the current federal courthouse, Bentsen Tower, and the construction of any new federal courthouse.
4. All documents between GSA and the Administrative Office of the United States Courts related to the U.S. Courthouse in McAllen, Texas from the period of January 1, 2016 through January 15, 2019, including those related to the current federal courthouse, Bentsen Tower, and the construction of any new federal courthouse.
5. All emails from any and all of Robert Andrukonis' (Director, Center for Courthouse Programs) email accounts, from the period of January 1, 2016 through January 15, 2019, referencing:
 - a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa

¹ An "agency record" includes "the products of data compilation, such as all books, papers, maps, photographs, and machine readable materials, inclusive of those in electronic form or format, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law in connection with the transaction of public business and in DA possession and control at the time the FOIA request is made." 32 CFR § 518.7(b).

² As used herein, the term "document" should be interpreted broadly to include anything that constitutes an "agency record" including, but not limited to, emails and other electronic communications.

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- h. Cruz
 - i. Darling
 - j. Cornyn
 - k. Brooks
 - l. Hernandez
 - m. Gilbert
 - n. Franz
 - o. Vela
 - p. Gonzalez
6. All emails from any and all of Kendra Turner's (Director, Lease Project Delivery) email accounts, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
 - j. Cornyn
 - k. Brooks
 - l. Hernandez
 - m. Gilbert
 - n. Franz
 - o. Vela
 - p. Gonzalez
7. All emails from any and all of Dennis Miller's (PBS Southwest Region, Chief Architect) email accounts, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
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- k. Brooks
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8. All emails from any and all of Laura Stagner's (Assistant Commissioner, Office of Project Delivery) email accounts, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
 - j. Cornyn
 - k. Brooks
 - l. Hernandez
 - m. Gilbert
 - n. Franz
 - o. Vela
 - p. Gonzalez
9. All emails from any and all of David Insinga's (Chief Architect, Office of the Chief Architect) email accounts, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
 - j. Cornyn
 - k. Brooks

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10. All emails from any and all of Andrew Heller's (Deputy Assistant Commissioner, Office of Portfolio Management and Customer Engagement) email accounts, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
 - j. Cornyn
 - k. Brooks
 - l. Hernandez
 - m. Gilbert
 - n. Franz
 - o. Vela
 - p. Gonzalez
11. All emails from any and all of Stuart Burns' (Assistant Commissioner, Office of Portfolio Management and Customer Engagement) email accounts, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
 - j. Cornyn
 - k. Brooks
 - l. Hernandez

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- m. Gilbert
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 - o. Vela
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12. All emails from any and all of Sylvia L. Hernandez's (Regional Administrator) email accounts, including sylvia.hernandez@gsa.gov, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
 - j. Cornyn
 - k. Brooks
 - l. Hernandez
 - m. Gilbert
 - n. Franz
 - o. Vela
 - p. Gonzalez
13. All emails from any and all of Christopher Anzaldue's (Regional Operations Manager) email accounts, including christopher.anzaldue@gsa.gov, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
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 - m. Gilbert

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- n. Franz
 - o. Vela
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14. All emails from any and all of Natasha Franklin's (Program Specialist) email accounts, including natasha.franklin@gsa.gov, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
 - j. Cornyn
 - k. Brooks
 - l. Hernandez
 - m. Gilbert
 - n. Franz
 - o. Vela
 - p. Gonzalez
15. All emails from any and all of Dee Graham's (Contracting Officer) email accounts, including dee.graham@gsa.gov, from the period of January 1, 2016 through January 15, 2019, referencing:
- a. McAllen
 - b. Bentsen Tower
 - c. S.P. Plaza
 - d. Courthouse Project Priorities
 - e. CPP
 - f. Cuellar
 - g. Hinojosa
 - h. Cruz
 - i. Darling
 - j. Cornyn
 - k. Brooks
 - l. Hernandez
 - m. Gilbert
 - n. Franz

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16. All emails from any and all of Linda Perry's (Contracting Officer) email accounts, from the period of January 1, 2013 through December 31, 2013, referencing:

- a. McAllen
- b. Bentsen Tower
- c. S.P. Plaza

We are willing and able to pay all reasonable and applicable fees in connection with this request as required under statute and regulation. We request prior notice only if you determine that such costs will exceed \$1,000. Please feel free to contact me by phone (202-777-8953) or by email (lhimes@rjo.com) if you have any questions about this request or need further information.

Best regards,



Lisa N. Himes